

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

ALEXA BRENNEMAN, et al.,	:	Case No. 1:14-CV-00136
	:	
Plaintiffs,	:	Judge Michael R. Barrett
	:	
v.	:	
	:	
CINCINNATI BENGALS, INC.,	:	<b>JOINT MOTION FOR FINAL</b>
	:	<b>APPROVAL OF SETTLEMENT</b>
	:	<b>AGREEMENT RESOLVING OPT-IN</b>
Defendant.	:	<b>FLSA ACTION AND FED.R.CIV.P. 23</b>
	:	<b>CLASS ACTION, AWARDED CLASS</b>
	:	<b>COUNSEL ATTORNEY FEES AND</b>
	:	<b>COSTS AND CLASS REPRESENTATIVE</b>
	:	<b>INCENTIVE AWARD, AND</b>
	:	<b>DISMISSING THIS ACTION WITH</b>
	:	<b>PREJUDICE</b>

Plaintiff Alexa Brenneman, individually and on behalf of the Opt-In Plaintiffs and the conditionally certified Settlement Class, and Defendant Cincinnati Bengals, Inc. (collectively, the “Parties”) respectfully move this Court for an order:

1. Granting final approval of the Settlement Agreement as fair, reasonable, and adequate, and as consistent and in compliance with all applicable requirements of the Federal Rules of Civil Procedure, the United States Constitution, the Class Action Fairness Act of 2005, and the Rules of the Court, and in the best interests of all Parties, making the Settlement Agreement part of the Court’s Order;

2. Granting final approval of a Settlement Class defined as follows: all persons who were employed by the Bengals as Ben-Gal cheerleaders at any time from February 11, 2011 through January 31, 2014;

3. Directing the Parties and their counsel to further implement and consummate the Settlement Agreement according to its terms;

4. Incorporating the releases provided for in the Settlement Agreement;
5. Awarding Class Counsel their reasonable Attorney Fees of \$140,000, and awarding Ms. Brenneman an Incentive Award of \$5,000.
6. Dismissing the Lawsuit on the merits and with prejudice, without fees or costs to any Party except as provided in the Settlement Agreement and as adopted and ordered by the Court in its Order; and
7. Retaining jurisdiction as to all matters relating to the administration, implementation, consummation, enforcement, and interpretation of the Settlement Agreement and this Order, and for any other necessary purpose.

A memorandum in support is attached.

Respectfully submitted,

/s/ Todd B. Naylor

Jeffrey S. Goldenberg (0063771)  
Todd B. Naylor (0068388)  
Goldenberg Schneider, LPA  
One West Fourth Street, 18th Floor  
Cincinnati, OH 45202  
Telephone: 513.345.8291  
Facsimile: 513.345.8294  
jgoldenberg@gs-legal.com  
tnaylor@gs-legal.com

Christian A. Jenkins (0070674)  
Minnillo & Jenkins, Co. LPA  
2712 Observatory Avenue  
Cincinnati, OH 45208  
Telephone: 513.723.1600  
Facsimile: 513.723.1620

Class Counsel

/s/ Justin D. Flamm

W. Stuart Dornette (0002955)  
Justin D. Flamm (0071575)  
Taft Stettinius & Hollister LLP  
425 Walnut Street, Suite 1800  
Cincinnati, OH 45202-3957  
Tel: 513.381.2838  
Fax: 513.381.0205  
dornette@taftlaw.com  
flamm@taftlaw.com

Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was served via the Court's CM/ECF system this 19th day of November, 2015, which will provide notice to all counsel of record.

/s/ Todd B. Naylor

Todd B. Naylor